

U.S. Department of Justice

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DJ 175-48-298

**United States Attorney's Office
District of New Jersey**

U.S. Mail: 970 Broad Street 7th Floor
Newark, New Jersey 07102
Telephone: (973) 645-2700
Facsimile: (973) 645-2702

**Civil Rights Division
Housing and Civil Enforcement
Section**

U.S. Mail: 950 Pennsylvania Avenue, NW - 4CON
Washington, DC 20530
Overnight: 150 M Street, NE
Room 8.000
Washington, DC 20002
Telephone: (202) 514-4713
Facsimile: (202) 514-1116

November 22, 2021

By ECF

The Honorable André M. Espinosa
Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: **United States v. Centanni, No. 2:20-cv-10053 (JXN) (AME)**

Dear Judge Espinosa:

We write on behalf of both parties to update the Court in advance of the November 29, 2021 status conference scheduled in the above-referenced matter. *See* ECF No. 28.

On November 30, 2020, the Court issued its Pretrial Scheduling Order. ECF No. 12 (ordering fact discovery to remain open through September 30, 2021, among other things). On April 19, 2021, the Court granted defendant's request for a six-month stay of this action. ECF No. 22. The stay expired on October 19, 2021.

During the past several months, the parties have negotiated in good faith to explore potential resolution of this matter before the defendant devotes substantial resources to discovery. The parties have made substantial progress and expect to reach final agreement on a proposed Consent Decree to resolve this matter and submit it to the Court soon. The parties therefore do not believe it is necessary to ask the Court to enter a new Scheduling Order at this time. However, should the parties be unable to reach resolution as expected, the parties would request a new Scheduling Order and would submit proposed dates to the Court. The parties will be prepared to discuss the status of a potential resolution during the November 29 conference.

We thank the Court for its attention to this matter.

Respectfully submitted,

SAMEENA SHINA MAJEED
Chief, Housing and Civil Enforcement
Section

RACHAEL A. HONIG
Acting United States Attorney

By: s/ Erin Meehan Richmond
Erin Meehan Richmond
Trial Attorney

By: s/ Susan Millenky
Susan Millenky
Assistant United States Attorney

cc: Counsel of Record (By ECF)

CERTIFICATE OF SERVICE

I, Susan Millenky, Assistant United States Attorney for the District of New Jersey, hereby certify that on November 22, 2021, a copy of the foregoing letter was served on counsel for all parties by ECF.

Dated: Newark, New Jersey
November 22, 2021

s/ Susan Millenky
SUSAN MILLENKY
Assistant United States Attorney